

SEALED

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

1. ANTON PETROV KULKIN,
a/k/a David Solmonov Ashkenazi,
a/k/a Emil Ivanov Asenov, a/k/a Toni; and

2. CARLOS ACERO PADILLA a/k/a Charly,
Defendants

Criminal No.

VIOLATIONS:

21 U.S.C. § 846 – Conspiracy
to Possess with Intent to
Distribute and to Distribute Carfentanil

21 U.S.C. § 853 – Drug Forfeiture Allegation

COUNT ONE: Title 21, United States Code, Section 846 – Conspiracy to Possess with Intent to Distribute and to Distribute Carfentanil

The Grand Jury charges that:

Beginning no later than December 2017, and continuing thereafter until at least August 28, 2018, the exact dates unknown to the Grand Jury, in the District of Massachusetts, the Central District of California, Mexicali, Mexico, and elsewhere,

(1) ANTON PETROV KULKIN, a/k/a David Solmonov Ashkenazi, a/k/a Emil Ivanov Asenov, a/k/a Toni,

and

(2) CARLOS ACERO PADILLA a/k/a Charly,

defendants herein, conspired with each other and with other persons known and unknown to the Grand Jury to knowingly and intentionally possess with intent to distribute, and to distribute, a mixture and substance containing a detectable amount of carfentanil, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

DRUG FORFEITURE ALLEGATION

Title 21, United States Code, Section 853

1. Upon conviction of the offense in violation of Title 21, United States Code, Section 846, set forth in Count One of this Indictment,

(1) ANTON PETROV KULKIN, a/k/a David Solmonov Ashkenazi, a/k/a Emil Ivanov Asenov, a/k/a Toni,

and

(2) CARLOS ACERO PADILLA a/k/a Charly,

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

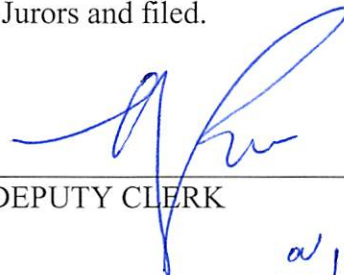
A TRUE BILL


FOREPERSON OF THE GRAND JURY


NADINE PELLEGRINI
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; August 28, 2018.

Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK

DATED: 8/28/18

a/ 12:55 PM

8/28/18